

TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

232881

CHARLESTON
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Danny C. Crowe

REPLY TO:

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October 17, 2011

VIA HAND DELIVERY

Jocelyn Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Suite 100
Columbia, SC 29210

Re: Application for South Carolina Electric & Gas Company for a Certificate of
Environmental Compatibility and Public Convenience, etc.
Docket No. 2011-325-E

Dear Ms. Boyd:

Enclosed for filing on behalf of Richland County in the above-referenced matter is an Interrogatory to South Carolina Electric and Gas Company, along with an attached Certificate of Service.

With kind regards, I am

Very truly yours,

TURNER, PADGET, GRAHAM & LANEY, P.A.

Danny C. Crowe

DCC/lb
Enclosure

BUSINESS • LITIGATION • SOLUTIONS

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October 17, 2011

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cc: Shannon Bowyer Hudson, Esquire
Jeffrey M. Nelson, Esquire
Carlisle Roberts, Esquire
Duane Parris
John E. Frampton
Matthew W. Gissendanner, Esquire
K. Chad Burgess, Esquire
Belton T. Zeigler, Esquire
(all with enclosures)

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-325-E

RECEIVED
PUBLIC SERVICE
COMMISSION
JAN 17 2012

IN RE:

Application of South Carolina Electric &)
Gas Company for a Certificate of)
Environmental Compatibility and Public)
Convenience and Necessity for the)
Construction and Operation of a 230 kV)
Transmission Line from its V.C. Summer)
Switchyard #1 to its Killian Transmission)
Substation and two 230 kV Transmission)
Lines from its V.C. Summer Switchyard #2)
To its Lake Murray Transmission Substation)
_____)

**INTERROGATORY TO SOUTH
CAROLINA ELECTRIC AND
GAS COMPANY FROM RICHLAND
COUNTY**

Richland County, a Party of Record, requests that South Carolina Electric and Gas Company, answer in writing the following Interrogatory (including all subsections), no later than the time of the commencement of the hearing on the Application:

With regard to transmission lines for the proposed Route K between the future Blythewood substation and the existing Killian substation (“the selected Route”), please provide the following information:

(a) A list of all parcels of real property (by owner and TMS number) in the selected Route as to which SCE&G (or any person or entity acting on behalf of SCE&G) has obtained an easement or right-of-way agreement for transmission lines.

(b) A list of all parcels of real property (by owner and TMS number) in the selected Route for which an easement or right-of-way agreement for transmission lines will be needed but has not yet been obtained.

(c) The size (by length and acreage) of each easement or right-of-way listed in response to subsection (a) above.

(d) The signature date of each easement or right-of-way agreement listed in response to subsection (a) above.

(e) The compensation paid, or true consideration given, for each easement or right-of-way agreement listed in response to subsection (a) above.

(f) The latest estimated cost for each easement or right-of-way agreement listed in response to subsection (b) above.



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ATTORNEYS FOR RICHLAND COUNTY

October 17, 2011

CERTIFICATE OF SERVICE

I, Lynne Bennink, an employee of Turner, Padgett, Graham & Laney, P.A., do hereby certify that I have served all counsel and parties in this action with a copy of the Interrogatory to South Carolina Electric and Gas Company from Richland County by hand-delivery to Belton T. Zeigler, Esquire and by e-mailing and mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Counsel and Parties served:

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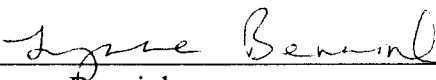
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Lynne Bennink
Secretary to Danny C. Crowe

October 17, 2011

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CLERK OF COURT
JUDICIAL BRANCH
COLUMBIA COUNTY